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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ERIC GOOCH, LARNELL A. TRIPP, JR., and ASHLEY N. WHITE, Defendants.	INDICTMENT 1:13CR282 CASE NO. Title 18, §§ 1951(a), 924(c) and 2113(a) and (d), and 2, United States Code JUDGE OLIVER

COUNT 1

1. At all times material to this Indictment, the Roses Discount Store located at 3250 West 65th Street, Cleveland, Ohio, was engaged in the retail sale of articles and commodities which had moved in interstate commerce, to include clothing, electronics, food, furniture and other merchandise.

2. At all times material to this Indictment, the Roses Discount Store located at 3250 West 65th Street, Cleveland, Ohio, was owned and operated by Variety Wholesalers, Inc., which has its headquarters in Henderson, North Carolina.

The Grand Jury charges:

On or between December 2012 and January 21, 2013, in the Northern District of Ohio, Eastern Division, ERIC GOOCH, LARNELL A. TRIPP, JR., and ASHLEY N. WHITE did knowingly, willfully and unlawfully conspire and agree with each other and other persons both known and unknown to the Grand Jury to unlawfully obstruct, delay, and affect commerce, or attempt to unlawfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and to unlawfully obstruct, delay and affect the movement of articles and commodities in such commerce by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants ERIC GOOCH, LARNELL A. TRIPP, JR., and ASHLEY N. WHITE, and others known and unknown to the Grand Jury did obtain or attempt to obtain monies in the custody, possession and presence of employees of Roses Discount Store by means of actual and threatened force, violence and fear of immediate injury to the employees and others, in that defendant LARNELL A. TRIPP, JR. did brandish a firearm in the presence of said employees, demand money, and take money from the presence of the employees, in violation of Title 18, Sections 1951(a) and 2, United States Code.

OVERT ACTS

In furtherance thereof, and to affect the goals and conceal the existence of the conspiracy, the defendants and others performed overt acts including but not limited to the following:

1. On or between December 2012 and January 21, 2013, defendants ERIC GOOCH, LARNELL A. TRIPP, JR., ASHLEY N. WHITE (an employee of Roses Discount Store) and other co-conpsirators met to discuss the robbery of Roses Discount Store, including the lay-out of the store, the location of the money in the store, and who would actually go into the store to commit the robbery.

2. On or about January 21, 2013, ERIC GOOCH, LARNELL A. TRIPP, JR., and other co-conspirators, drove to the area of Roses Discount Store for purposes of committing the robbery.

3. On or about January 21, 2013, LARNELL A. TRIPP, JR. entered Roses Discount Store, brandished a firearm at an employee and demanded that the employee take him to the manager and the store vault.

4. On or about January 21, 2013, LARNELL A. TRIPP, JR. held a Roses Discount Store manager at gunpoint and ordered her to open the vault. LARNELL A. TRIPP, JR. then stole approximately $16,426 from the vault and fled the store into a waiting vehicle driven by a co-conspirator.

5. ERIC GOOCH, LARNELL A. TRIPP, JR., ASHLEY N. WHITE, and other co-conspirators then split the money stolen from Roses Discount Store.

COUNT 2

The Grand Jury further charges:

On or about January 21, 2013, in the Northern District of Ohio, Eastern Division, defendants ERIC GOOCH, LARNELL A. TRIPP, JR., ASHLEY N. WHITE, and other co-conspirators known and unknown to the Grand Jury did unlawfully obstruct, delay and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951 (b) (1), in that defendants ERIC GOOCH, LARNELL A. TRIPP, JR., ASHLEY N. WHITE, and other co-conspirators known and unknown to the grand jury did aid and abet one another to obtain monies in the custody, possession and presence of employees of Roses Discount Store located at 3250 West 65th Street, Cleveland, Ohio, by means of actual and threatened force, violence, and fear of immediate injury to the employees and others, in that a firearm was displayed and brandished in the presence of said employees, and money was demanded and taken from the presence of the employees, in violation of Title 18, Sections 1951(a) and 2, United States Code.

COUNT 3

The Grand Jury further charges:

On or about January 21, 2013, in the Northern District of Ohio, Eastern Division, defendants ERIC GOOCH, LARNELL A. TRIPP, JR., ASHLEY N. WHITE, and other co-conspirators known and unknown to the Grand Jury, during and in relation to a crime of violence which may be prosecuted in a court of the United States, that is, Interference with Commerce by Means of Robbery, as charged in Count 2 of the Indictment, a violation Title 18, Section 1951(a), United States Code, did knowingly use, carry and brandish a firearm, and/or aid and abet one another to use, carry, and brandish a firearm, in violation of Title 18, Sections 924(c)(1)(A) and 2, United States Code, and punishable under Title 18, Section 924(c)(1)(A)(ii), United States Code.

COUNT 4

The Grand Jury further charges:

On or about February 22, 2013, in the Northern District of Ohio, Eastern Division, ERIC GOOCH, defendant herein, aided and abetted by co-conspirators known and unknown to the Grand Jury, by force and violence and by intimidation, did take and cause to be taken from the person and presence of tellers and other employees at the PNC Bank, 16614 Harvard Avenue, Cleveland, Ohio, approximately $158,831 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the

Federal Deposit Insurance Corporation, and in committing such offense, defendant ERIC GOOCH and other co-conspirators did assault and put in jeopardy the lives of bank employees and others by the use of firearms, in violation of Title 18, Sections 2113 (a) and (d) and 2, United States Code.

COUNT 5

The Grand Jury further charges:

On or about February 22, 2013, in the Northern District of Ohio, Eastern Division, defendant ERIC GOOCH, aided and abetted by co-conspirators known and unknown to the Grand Jury, did knowingly use, carry, and brandish firearms, during and in relation to a crime of violence for which said defendant may be prosecuted in a court of the United States, that is, Armed Bank Robbery, in violation of Title 18, Sections 2113(a) and (d), United States Code, as charged in Count 4 of the Indictment, in violation of Title 18, Sections 924(c)(1)(A) and 2, United States Code, and punishable under Title 18, Section 924(c)(1)(A)(ii), United States Code.

COUNT 6

The Grand Jury further charges:

On or about March 13, 2013, in the Northern District of Ohio, Eastern Division, ERIC GOOCH, defendant herein, aided and abetted by co-conspirators known and unknown to the Grand Jury, by force and violence and by intimidation, did take and cause to be taken from the person and presence of tellers and other employees at the PNC Bank, 2771 South Moreland Boulevard, Cleveland, Ohio, approximately $126,000 in monies belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant ERIC GOOCH and other co-conspirators did assault and put in jeopardy the lives of bank employees and others by the use of a firearm, in violation of Title 18, Sections 2113 (a) and (d) and 2, United States Code.

COUNT 7

The Grand Jury further charges:

On or about March 13, 2013, in the Northern District of Ohio, Eastern Division, defendant ERIC GOOCH, aided and abetted by co-conspirators known and unknown to the Grand Jury, did knowingly use, carry, and brandish a firearm, during and in relation to a crime of violence for which said defendant may be prosecuted in a court of the United States, that is, Armed Bank Robbery, in violation of Title 18, Sections 2113(a) and (d), United States Code, as charged in Count 6 of the Indictment, in violation of Title 18, Sections 924(c)(1)(A) and 2, United States Code, and punishable under Title 18, Section 924(c)(1)(A)(ii), United States Code.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.